



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

April 29, 1999

Mr. Kevin O'Neill
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401

RE: Comments on the Draft Final Proposed Plan for Waste Area Group 5, Operable Unit
5-12, at INEEL

Dear Kevin:

Enclosed are our comments on the Draft Final Proposed Plan for WAG 5. According to the discussion yesterday during our conference call, I believe we are in agreement on how to resolve these comments. If there are any outstanding issues, please contact me and let's discuss them prior to finalizing the Proposed Plan.

Sincerely,

A handwritten signature in black ink, which appears to read "Keith A. Rose". The signature is fluid and cursive.

Keith A. Rose
INEEL WAG Manager

Enclosure
cc: Scott Reno, IDEQ

EPA COMMENTS ON DRAFT FINAL WAG 5 PROPOSED PLAN

1. Page 6, 3rd paragraph. The second sentence should read, "Though areas within individual WAG boundaries have been contaminated by human activities, most of the ecological environment at INEEL is undisturbed." In the last sentence, eliminate the last part which reads, "or if land use changes". Land use changes should not have an effect on ecological risks.
2. Tables 2 through 13. Place the "Future Residential Risk" and "Maximum Hazard Quotient" columns next to each other and to the left of the "Preliminary Remedial Goal" column.
3. Page 14, Table 7. Establishing a lead cleanup goal below the EPA screening level of 400 mg/kg would set a national precedence. Identify lead as a COC for human health with a PRG of 400 mg/kg and eliminate it as a COC for ecological receptors.
4. Page 15, Table 8. Is a hazard quotient of 50 correct for a maximum mercury concentration (0.71 mg/kg) which is only 42% above the PRG of 0.5 mg/kg?
5. Page 18, 3rd paragraph. Explain the basis for the cost ranges provided for alternatives 5a and 5b. For each alternative, consider identifying the cost associated with a 90% volume reduction using SGS.
6. Page 18, last paragraph. Briefly explain how the preferred alternative complies with the principal ARARs. This comment also applies to the preferred alternatives for the Sanitary Waste System and for the Radionuclide Tank.
7. Page 19, 2nd paragraph, 3rd sentence. Revise this sentence, alternative 5a does not require Institutional Controls beyond 100 years.
8. Page 20, Table 9. Show the range of costs for alternatives 5a and 5b.
9. Page 23, Table 11. There are no EPA approved reference doses for noncarcinogenic effects due to PCBs. Since the cleanup of the sludge is driven by radionuclides identified in Table 10, eliminate Table 11 and the discussion in the text of Aroclor-1242 exceeding an acceptable risk threshold for human health. As an option, Table 10 could be footnoted to mention that cleanup action required for the radionuclides would address potential health risks due to PCBs.
10. Pages 30 and 31. Alternatives 3b1 and 3b2. In the evaluation of both of these alternatives it is initially stated that they will comply with regulations, but then it is stated that compliance with ARARs would have to be demonstrated. It would be best to say that "compliance is expected but will have to be verified by post-treatment tests".